

David S. Gingras, #021097
Gingras Law Office, PLLC
4802 E. Ray Road, #23-271
Phoenix, AZ 85044
Tel.: (480) 264-1400
David@GingrasLaw.com

Attorney for Defendant/Counterclaimant
Chai Research Corp.

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

Zhang JC, an individual,

Plaintiff/Counterdefendant,

v.

Chai Research Corp,

Defendant/Counterclaimant.

Case No. 24-cv-267-SMB

**AFFIDAVIT OF WILLIAM
BEAUCHAMP IN SUPPORT OF CHAI
RESEARCH CORP.'S
MOTION FOR SUMMARY JUDGMENT**

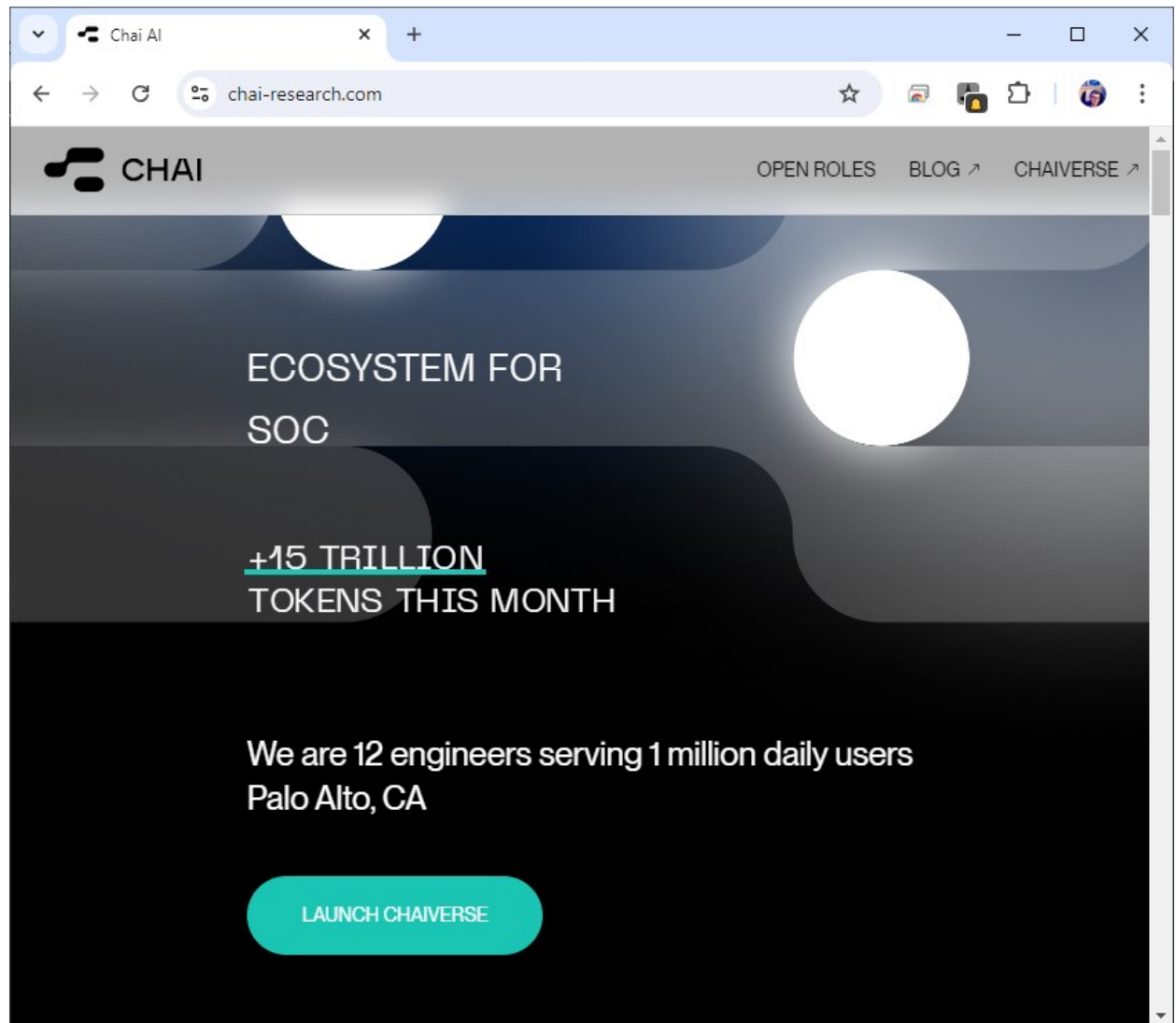
I, William Beauchamp hereby declare as follows:

1. My name is William Beauchamp. I am a resident of the State of California, am over the age of 18 years, and if called to testify in court or other proceeding I could and would give the following testimony which is based upon my own personal knowledge.

2. I am the founder and CEO of Defendant/Counterclaimant Chai Research Corporation. I have worked for Chai for more than two years.

1 3. In my capacity as CEO of Chai, I am familiar with the company's business
2 operations, the products and services it offers, and marketing relating to the company.

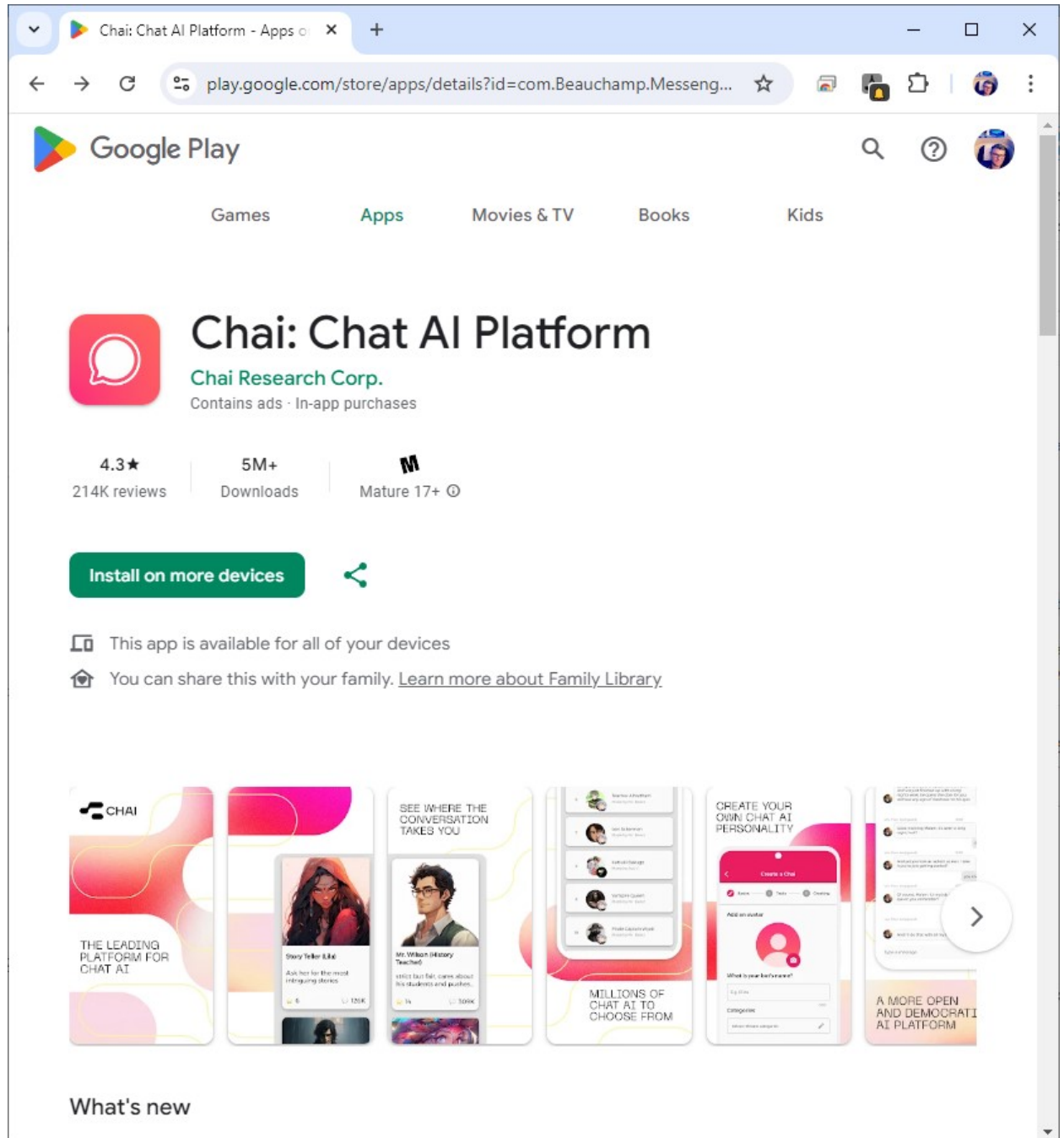
3 4. Chai's primary website is <https://www.chai-research.com/>, the home screen
4 of which is shown here:



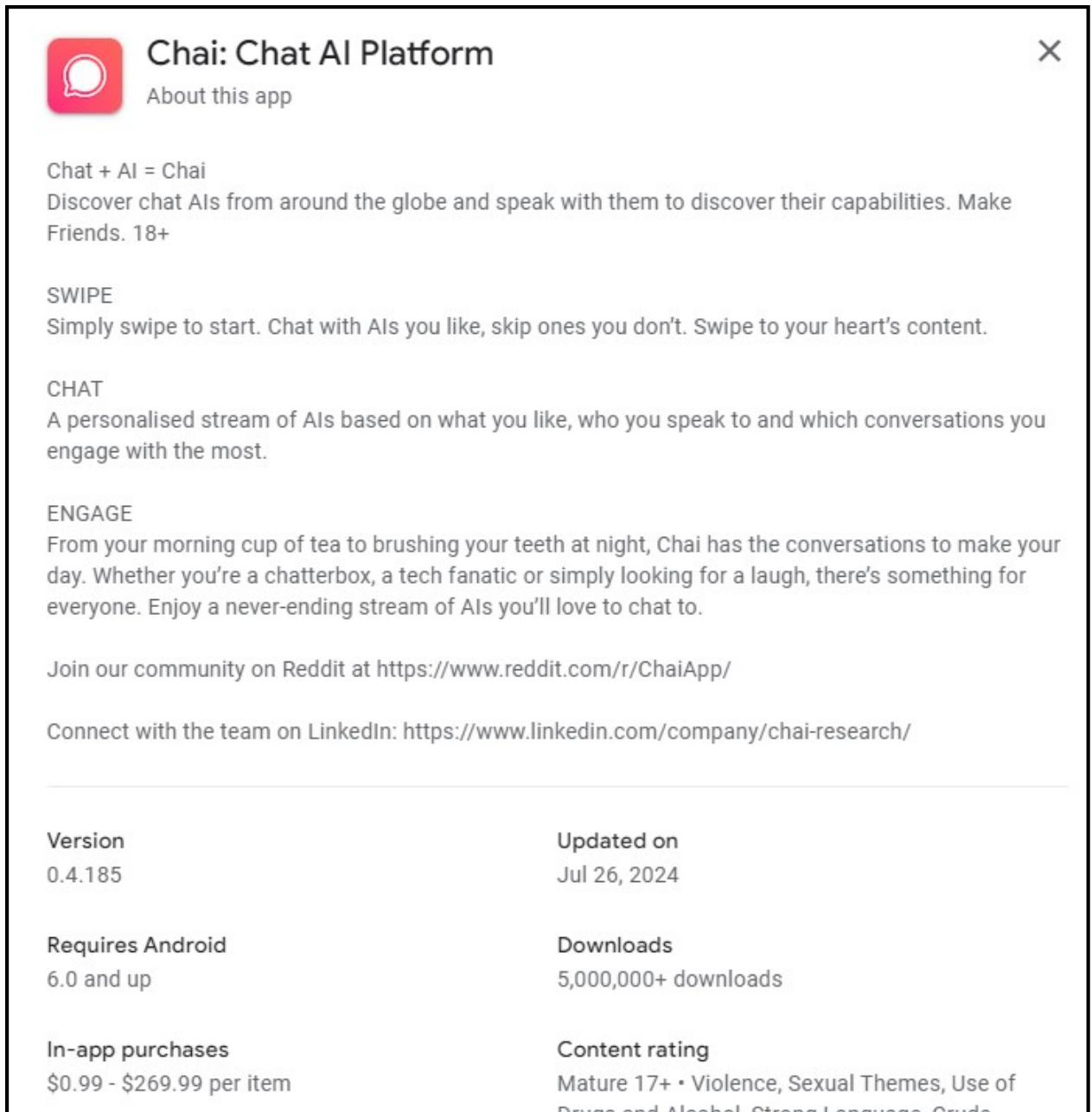
23

24 5. Among other things, one of Chai's primary business offerings is a software
25 application or "app" called: "Chai: Chat AI Platform". The Chai AI platform is a
26 "chatbot" which allows users to speak with a variety of artificial intelligence-based
27 "bots" which have different personas.

6. As reflected below, Chai's Chat AI app is currently offered in the Google Play store as well as Apple's appstore. As of August 2, 2024, the app has been downloaded more than 5 million times, and has a favorable rating of 4.3 stars (out of 5) with more than 214,000 reviews on the Google Play Store alone.



7. A description of the Chai Chat AI app, as advertised on the Google Play Store, is shown here:



Pursuant to 28 U.S.C. § 1746 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED ON: August 2, 2024.

By /s/ William Beauchamp
William Beauchamp